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August 7, 2023

Judge Joseph N. Laplante
United States District Court
55 Pleasant Street
Concord, NH 03301

Re: *United States v. Ian Freeman*, 21-cr-00041-1

Dear Judge Laplante,

I am attaching this letter to my notice of appearance as co-counsel for Ian Freeman because I previously represented another co-defendant in this case. At the outset of the case, I was appointed by the Court to represent Aria DiMezzo. Ms. DiMezzo's case is now concluded. She has pleaded guilty, been sentenced, and declined to enter any appeal. She is currently serving her sentence of incarceration. Her fine has been paid in full and all forfeiture issues have been resolved. My CJA voucher has been submitted and paid.

After Ms. DiMezzo's case was concluded, Mr. Freeman asked that I join his current defense counsel, Attorney Sisti, as co-counsel. There are overlapping, complicated legal and factual issues such that Mr. Freeman thought it would be to his advantage to have me join in his representation. After review, I determined that it would not be a conflict of interest for me to represent Mr. Freeman after having represented Ms. DiMezzo. Ms. DiMezzo was not a witness at Mr. Freeman's trial, nor will she play any role in Mr. Freeman's sentencing or appeal.

I explained these circumstances and Mr. Freeman's request to Ms. DiMezzo. I asked Ms. DiMezzo if she objects or agrees to me representing Mr. Freeman. Ms. DiMezzo notified me in writing that she has no objection.

I asked the Government if it has any objection to my representation of Mr. Freeman. Assistant United States Attorney Georgianna MacDonald responded that the Government does not have any objection.

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Mr. Freeman has retained me privately. My representation would not be as appointed counsel.

I am submitting this letter of explanation with my appearance since it is not common for defense counsel to represent one co-defendant after another co-defendant's case has been resolved. I hope I have addressed any concerns the Court might have. I will, of course, be happy to provide additional information if the Court requests it.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Guerriero", written in a cursive style.

Richard Guerriero